

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

PRESIDENTIAL HEALTHCARE CREDIT
CORPORATION,

Plaintiff,

-v-

WHITE RABBIT PARTNERS, INC et al

Defendant,

-v-

THE VANGUARD GROUP, INC.

Garnishee,

CIVIL DIVISION

Case No: 19-mc-144

PRAECIPE FOR WRIT OF EXECUTION

TO THE CLERK:

ISSUE WRIT OF EXECUTION in the above matter, against defendant Mark Honzel
and against The Vanguard Group, Inc a/k/a Vanguard Funds 100 Vanguard Blvd, Malvern, PA 19
(Name and Address of Garnishee)

garnishee, as follows:

Amount Due: \$ 6,531,080.04

Interest from: Judgement of May 15, 2019

at legal rate of 6% \$ 76,225.76

Total: \$6,607,305.80

Respectfully Submitted

/s/ Richard J. Parks

Gaetan J. Alfano, Esq

PA. I.D. # 32971

Richard J. Parks, Esq

PA. I.D. #40477

PIETRAGALLO GORDON ALFANO BOSICK
& RASPANTI, LLP

1818 Market Street, Suite 3402

Philadelphia, PA 19103

Date: July 26, 2019

4929377v1

Civ637(7/00)

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

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CORPORATION,

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TO THE UNITED STATES MARSHAL FOR THE EASTERN DISTRICT OF
PENNSYLVANIA OR THE COURT APPOINTED PROCESS SERVER:

To satisfy judgment, interest, and costs against Mark Honzel, defendant
(Name of Defendant)

- (1) You are directed to levy upon the property of the defendant and to sell his interest therein:
(2) You are also directed to attach the property of the defendant not levied upon in the
possession of The Vanguard Group, Inc a/k/a Vanguard Funds, as garnishee.
(Name of Garnishee)

Property Identified as A Result of Interrogatories to Garnishee
(Specifically Describe Property)

and to notify the garnishee that

(a) an attachment has been issued;

(b) the garnishee is enjoined from paying any debt to or for the account of the defendant and
from delivering any property of the defendant or otherwise disposing thereof;

(3) if property of the defendant not levied upon and subject to attachment is found in the
possession of anyone other than a named garnishee, you are directed to notify him that he has been
added as a garnishee and is enjoined as above stated.

Amount Due		\$ 6,531,080.04
Interest from	<u>May 15, 2019 at 6%</u>	\$ <u>76,225.76</u>
(Cost to be Added)		\$ _____
Total		\$6,607,305.80

KATE BARKMAN
Clerk of Court

Seal of the Court

BY: _____
(Deputy Clerk)

MAJOREXEMPTIONSUNDERPENNSYLVANIAANDFEDERALLAW

1. \$300 statutory exemption
2. Bibles, school books, sewing machines, uniforms, and equipment
3. Most wages and unemployment compensation
4. Social Security benefits
5. Certain retirement funds and accounts
6. Certain veteran and armed forces benefits
7. Certain insurance proceeds
8. Such other exemptions as may be provided by law

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**WRIT OF EXECUTION
NOTICE**

This paper is a Writ of Execution. It has been issued because there is a judgment against you. It may cause your property to be held or taken to pay the judgment. You may have legal rights to prevent your property from being taken. A lawyer can advise you more specifically of these rights. If you wish to exercise your rights, you must act promptly.

The law provides that certain property cannot be taken. Such property is said to be exempt. There is a debtor's exemption of \$300. There are other exemptions which may be applicable to you. Attached is a summary of some of the major exemptions. You may have other exemptions or rights.

If you have an exemption, you should do the following promptly: (1) Fill out the attached claim form and demand for a prompt hearing. (2) Deliver the form or mail it to the United States Marshal's office at the address noted.

You should come to court ready to explain your exemption. If you do not come to court and prove your exemption, you may lose some of your property.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

LAWYER REFERENCE SERVICE

(Name)

**ONE READING CENTER
11TH FLOOR
PHILADELPHIA, PA 19107**

(Address)

(215) 238-1701

(Telephone Number)

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CLAIM FOR EXEMPTION

To the U.S. Marshal:

I, the above named defendant, claim exemption of property from levy or attachment:

(1) From my personal property in my possession which has been levied upon.

(a) I desire that my \$300 statutory exemption be

(i) set aside in kind (specify property to be set aside in kind):

(ii) paid in cash following the sale of the property levied upon; or

(b) I claim the following exemption (specify property and basis of exemption):

(2) From my property which is in the possession of a third party, I claim the following exemptions:

(a) My \$300 statutory exemption: in cash in kind

(specify property): _____

(b) Social security benefits on deposit in the amount of \$ _____

(c) Other (specify amount and basis of exemption): _____

I request a prompt court hearing to determine the exemption. Notice of the hearing should be given to me at _____

(Address)

(Telephone Number)

I declare under penalty of perjury that the foregoing statements made in this claim for exemption are true and correct.

Date: _____

(Signature of Defendant)

**THIS CLAIM TO BE FILED WITH THE OFFICE OF THE U.S. MARSHAL
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**2110 United States Courthouse
601 Market Street
Philadelphia, PA 19106**

(Address)

(215) 597-7272

(Telephone Number)

Note: Under paragraphs (1) and (2) of the writ, a description of specific property to be levied upon or attached may be set forth in the writ or included in a separate direction to the United States Marshal.

Under paragraph (2) of the writ, if the attachment of a named garnishee is desired, his name should be set forth in the space provided.

Under paragraph (3) of the writ, the United States Marshal may, as under prior practice, add as a garnishee any person not named in this writ who may be found in possession of property of the defendant. See Rule 3111(a). For limitations on the power to attach tangible personal property, see Rule 3108 (a).

Each court shall by local rule designate the officer, organization, or person to be named in the notice.

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INTERROGATORIES TO GARNISHEE

To: The Vanguard Group, Inc a/k/a Vanguard Funds
100 Vanguard Blvd,
Malvern, PA 19355

**YOU ARE REQUIRED TO FILE ANSWERS TO THE FOLLOWING
INTERROGATORIES WITHIN TWENTY (20) DAYS AFTER SERVICE UPON YOU.
FAILURE TO DO SO MAY RESULT IN JUDGMENT AGAINST YOU:**

1. At the time you were served or at any subsequent time did you owe the defendant Mark Honzel. (hereinafter "Defendant") any money or were you liable to defendant(s) on any negotiable or other written instrument, or did defendant(s) claim that you owed defendant(s) any money or were liable to defendant(s) for any reason?

ANSWER:

2. At the time you were served or at any subsequent time was there in your possession, custody or control or in the joint possession, custody or control of yourself and one or more other persons any property of any nature owned solely or in part by the defendant(s)?

ANSWER:

3. At the time you were served or at any subsequent time did you hold legal title to any property of any nature owned solely or in part by the defendant(s) or in which defendant(s) held or claimed any interest?

ANSWER:

4. At the time you were served or at any subsequent time did you hold as fiduciary any property in which the defendant(s) had an interest?

ANSWER:

5. At any time before or after you were served did the defendant(s) transfer or deliver any property to you or to any person or place pursuant to your direction or consent and if so what was the consideration therefore?

ANSWER:

6. At any time after you were served did you pay, transfer or deliver any money or property to the defendant(s) or to any person or place pursuant to defendant's(s') direction or otherwise discharge any claim of the defendant(s) against you?

ANSWER:

7. If you are a bank or other financial institution, at the time you were served or at any subsequent time did the defendant(s) have funds on deposit in an account in which funds are deposited electronically on a recurring basis and which are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law? If so, identify each account and state the amount of funds in each account and the entity electronically depositing those funds on a recurring basis.

ANSWER:

8. If you are a bank or other financial institution, at the time you were served or at any subsequent time did the defendant(s) have funds on deposit in an account in which the funds on deposit, not including any otherwise exempt funds, did not exceed the amount of the general monetary exemption under 42 Pa.C.S. § 8123? If so, identify each account.

ANSWER:

9. At the time you were served or at any subsequent time, did you have or share any safe-deposit boxes, pledges, documents of title, securities, notes, coupons, receivables, or collateral in which there was an interest claimed by defendant(s)?

ANSWER:

10. Identify every account not previously noted, having a credit balance, including the account balance, titled in the name of defendant(s) or in which you believe defendant(s) have an interest in whole or in part, whether or not styled as a payroll account, individual retirement account, tax account, lottery account, partnership account, joint or tenants by entirety account, or otherwise.

ANSWER:

Respectfully Submitted

/s/ Richard J. Parks

Gaetan J. Alfano, Esq

PA. I.D. # 32971

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VERIFICATION

I, the undersigned, a duly authorized representative of The Vanguard Group a/k/a Vanguard Funds, hereby verify that the foregoing answers to interrogatories are true based upon my personal knowledge or information and belief. This statement is made subject to the penalties of 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.

Dated: _____, 2019